

COMMONWEALTH OF MASSACHUSETTS
UNITED STATES DISTRICT COURT

CIVIL ACTION NO.: 04-11800DPW

ADAM HELFAND, CARON HELFAND,)
AND MITCHELL HELFAND,)
Plaintiffs)
v.)
THE JOHN DEWEY ACADEMY, INC.,)
THOMAS BRATTER, CAROLE BRATTER,)
KEN STEINER, AND GWENDOLYN)
HAMPTON,)
Defendants)

JOINT MOTION TO EXTEND THE TIME FOR FILING
STIPULATION OF DISMISSAL

NOW COME the parties in the above-captioned matter and hereby request this Honorable Court extend the time to file a Stipulation of Dismissal an additional thirty days to **December 8, 2006**. As grounds therefore, the parties state the following:

1. The parties were able to amicably resolve this case on or about September 7, 2006.
2. Since that time, the parties have finalized the terms of the Settlement Agreement and Release of All Claims ("Agreement").
3. Additional time is needed to fully execute the agreement and accomplish other terms of the Agreement--both of which the parties anticipate being able to complete within the next thirty days, if not sooner.
4. The parties intend to file a Stipulation of Dismissal after the settlement process has been completed.

WHEREFORE, the parties request an additional thirty days to **December 8, 2006** in which to file a Stipulation of Dismissal to allow the parties ample time to secure a fully executed Settlement Agreement and Release of All Claims.

Respectfully submitted,
The Plaintiffs,
Adam Helfand, Caron Helfand, and
Mitchell Helfand,
By their attorneys,

Respectfully submitted,
The Defendants,
The John Dewey Academy, Inc.,
Thomas Bratter, Carole Bratter,
and Ken Steiner,
By their attorneys,

/s/ Djuna E. Perkins
Laurence E. Hardoon, BBO# 221360
Djuna E. Perkins, BBO# 561909
Brody, Hardoon, Perkins & Kesten, LLP
One Exeter Plaza
Boston, MA 02116
(617) 880-7100

/s/ William A. Worth
Joseph D. Steinfield, BBO# 478680
William A. Worth, BBO# 554086
Prince, Lobel, Glovsky & Tye, LLP
100 Cambridge Street, Suite 2200
Boston, MA 02114
(617) 456-8000

Respectfully submitted,
The Defendant,
Gwendolyn Hampton,
By her attorney,

/s/ William A. Rota
William A. Rota, BBO# 430760
75 North Street
Pittsfield, MA 01201
(413) 443-1900

DATED: November 9, 2006